

Hearing Date and Time: July 22, 2010 at 10:00 a.m.
Objection Deadline and Time: June 7, 2010 at 4:00 p.m.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

DPH HOLDINGS CORP., *et al.*

Debtors.

Chapter 11

Jointly Administered
Case No. 05-44481-RDD

DELPHI CORPORATION, *et al.*,

Plaintiffs,

VS.

NSK STEERING SYSTEMS,

Defendant.

Adversary Proceeding No.
07-02459-RDD

JOINDER OF NSK STEERING SYSTEMS AMERICA, INC. IN CERTAIN

**MOTIONS TO: (I) VACATE CERTAIN PRIOR ORDERS OF THE COURT
ESTABLISHING PROCEDURES FOR CERTAIN ADVERSARY PROCEEDINGS; (II)
DISMISS THE COMPLAINT WITH PREJUDICE; OR (III) IN THE ALTERNATIVE,
TO REQUIRE PLAINTIFFS TO FILE A MORE DEFINITIVE STATEMENT**

1. NSK Steering Systems America, Inc. ("Defendant"), by its attorneys, Miller, Canfield, Paddock and Stone, P.L.C., hereby joins and adopts with respect to the above captioned adversary proceeding ("Adversary Proceeding"), the arguments set forth in the Motions, together with the supporting memorandum, set forth on Exhibit A attached hereto ("Motions"). In the interest of legal and judicial efficiency Defendant will not reiterate the arguments which have already been made in the Motions. Instead, Defendant hereby incorporates by reference, as if fully stated herein, the arguments stated in the Motions.

Wherefore, NSK Steering Systems America, Inc., by its undersigned attorneys, joins and adopts the arguments set forth in Motions, and respectfully requests that any relief granted for the benefit of one or more adversary proceeding defendants be granted for NSK Steering Systems America, Inc.

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By /s/ Donald J. Hutchinson

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Dated: June 30, 2010

EXHIBIT A

- MOTION BY WAGNER-SMITH COMPANY SEEKING AND ORDER (1) PURSUANT TO FED. R. CIV. P. 60 AND FED. R. BANKR. P. 9024, VACATING PRIOR ORDERS ESTABLISHING PROCEDURES FOR CERTAIN ADVERSARY PROCEEDINGS, INCLUDING THOSE COMMENCED BY THE DEBTORS UNDER 11 U.S.C. 541, 544, 545, 547, 548, OR 549, AND EXTENDING THE TIME TO SERVE PROCESS FOR SUCH ADVERSARY PROCEEDINGS, AND (II) PURSUANT TO FED. R. CIV. P. 12(B) AND FED. R. BANKR. P. 7012(B), DISMISSING THE ADVERSARY PROCEEDING WITH PREJUDICE, OR (III) IN THE ALTERNATIVE, DISMISSING THE ADVERSARY PROCEEDING ON THE GROUND OF JUDICIAL ESTOPPEL, Dated February 5, 2010 Docket No. 19401 In Base Case
- MOTION BY MICROCHIP TECHNOLOGY INCORPORATED SEEKING AN ORDER (I) PURSUANT TO FED. R. CIV. P. 60 AND FED. R. BANKR. P. 9024, VACATING PRIOR ORDERS ESTABLISHING PROCEDURES FOR CERTAIN ADVERSARY PROCEEDINGS, INCLUDING THOSE COMMENCED BY THE DEBTORS UNDER 11 U.S.C. 541, 544, 545, 547, 548, OR 549, AND EXTENDING THE TIME TO SERVE PROCESS FOR SUCH ADVERSARY PROCEEDINGS, AND (II) PURSUANT TO FED. R. CIV. P. 12(B) AND FED. R. BANKR. P. 7012(B), DISMISSING THE ADVERSARY PROCEEDING WITH PREJUDICE, OR (III) IN THE ALTERNATIVE, DISMISSING THE ADVERSARY PROCEEDING ON THE GROUND OF JUDICIAL ESTOPPEL, Dated March 15, 2010 Docket No. 19677 In The Base Case
- MOTION BY AFFINA GROUP HOLDINGS, INC., AFFINA CANADA CORP. AND BREAK PARTS, INC. TO: (A) VACATE CERTAIN PRIOR ORDERS OF THE COURT; (B) DISMISS THE COMPLAINT WITH PREJUDICE; OR (C) IN THE ALTERNATIVE, TO DISMISS THE CLAIMS AGAINST CERTAIN DEFENDANTS NAMED IN THE COMPLAINT AND TO REQUIRE PLAINTIFFS TO FILE A MORE DEFINITE STATEMENT FILED WITH RESPECT TO ADVERSARY PROCEEDING NO. 07-02198(RDD). Docket No. In Base Case 19959
- MOTION BY MSX INTERNATIONAL, INC. TO: (A) VACATE CERTAIN PRIOR ORDERS OF THE COURT; (B) DISMISS THE COMPLAINT WITH PREJUDICE; (C) DISMISS THE CLAIMS AGAINST CERTAIN DEFENDANTS NAMED IN THE COMPLAINT; AND (D) DISMISS CLAIMS BASED ON ASSUMED CONTRACTS; OR (E) IN THE ALTERNATIVE, REQUIRE PLAINTIFFS TO FILE A MORE DEFINITE STATEMENT IN ADVERSARY PROCEEDING NO. 07-02484-(RDD). Base Case Docket No. 19995
- MOTION BY VALERO CLIMATE CONTROL, ET AL., TO: (A) VACATE CERTAIN PRIOR ORDERS OF THE COURT; (B) DISMISS THE COMPLAINT WITH PREJUDICE; (C) DISMISS THE CLAIMS AGAINST CERTAIN DEFENDANTS NAMED IN THE COMPLAINT; AND (D) DISMISS CLAIMS BASED ON ASSUMED CONTRACTS; OR (E) IN THE ALTERNATIVE, REQUIRE PLAINTIFFS TO FILE A MORE DEFINITE STATEMENT IN ADVERSARY PROCEEDING NO. 07-02534(RDD). Base Case Docket No. 20009

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07-02459-RDD

NSK STEERING SYSTEMS,

Defendant.

CERTIFICATE OF SERVICE

Donald J. Hutchinson hereby certifies that, on June 30, 2010, he served a copy of the foregoing Joinder of NSK Steering Systems America, Inc. in Motions to: (I) Vacate Certain Prior Orders of the Court Establishing Procedures for Certain Adversary Proceedings; (II) Dismiss the Complaint with Prejudice; or (III) in the Alternative, to Require Plaintiffs to File a More

Definitive Statement upon counsel for the Plaintiff and reorganized debtors first-class U.S. mail, postage prepaid and addressed as follows:

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The Honorable Robert D. Drain
United States Bankruptcy Judge
Chambers
Charles L. Brieant, Jr. United States Courthouse
300 Quarropas Street, 2nd Floor
White Plains NY 10601-4150

/s/ Donald J. Hutchinson

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Dated: June 30, 2010